

1 WRIGHT, FINLAY & ZAK, LLP
2 Edgar C. Smith, Esq.
3 Nevada Bar No. 5506
4 Patrick J. Davis, Esq.
5 Nevada Bar No. 13330
6 7785 W. Sahara Avenue, Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7967; Fax: (702) 946-1345
9 pdavis@wrightlegal.net

10 *Attorneys for Defendant, HSBC Bank USA N.A., as Trustee on Behalf of ACE Securities Corp.*
11 *Home Equity Loan Trust and for the Registered Holders of ACE Securities Corp. Home Equity*
12 *Loan Trust Series 2006-HE2, Asset Backed Pass Through Certificates*

13 **IN THE UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 HOLLYVALE RENTAL HOLDINGS, LLC,
16 a Nevada limited liability company,

17 Plaintiff,

18 vs.

19 RUBY F. PINEDA; an individual; LILIBETH
20 F. LACUESTA, an individual; HSBC BANK
21 USA N.A., AS TRUSTEE ON BEHALF OF
22 ACE SECURITIES CORP. HOME EQUITY
23 LOAN TRUST AND FOR THE
24 REGISTERED HOLDERS OF ACE
25 SECURITIES CORP. HOME EQUITY
26 LOAN TRUST SERIES 2006-HE2, ASSET
27 BACKED PASS THROUGH
28 CERTIFICATES; All other persons unknown
claiming any right, title, estate, lien or interest
in the real property described in the
Complaint adverse to Plaintiff's ownership, or
any cloud upon Plaintiff's title thereto; DOES
I through V; and ROE Corporations I through
V,

HSBC BANK USA N.A., AS TRUSTEE ON
BEHALF OF ACE SECURITIES CORP.
HOME EQUITY LOAN TRUST AND FOR
THE REGISTERED HOLDERS OF ACE

Case No.: 2:17-cv-01833-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO TRP
FUND V, LLC's MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

(First Request)

1 SECURITIES CORP. HOME EQUITY
2 LOAN TRUST SERIES 2006-HE2, ASSET
3 BACKED PASS THROUGH
4 CERTIFICATES

5 Counterclaimant

6 vs.

7 HOLLYVALE RENTAL HOLDINGS, LLC,
8 a foreign limited liability company;
9 CHAMPERY RENTAL REO, LLC, a foreign
10 limited liability company; TIERRA LINDA
11 LANDSCAPE MAINTENANCE
12 ASSOCIATION, INC., a Nevada corporation;
13 RED ROCK FINANCIAL SERVICES, LLC;
14 a Nevada limited liability company

15 Counter-defendants,

16 Counterclaimant, HSBC Bank USA N.A., as Trustee on Behalf of ACE Securities Corp.
17 Home Equity Loan Trust and for the Registered Holders of ACE Securities Corp. Home Equity
18 Loan Trust Series 2006-HE2, Asset Backed Pass Through Certificates ("HSBC") by and
19 through its attorney of record Patrick J. Davis, Esq. of the law firm of Wright, Finlay & Zak,
20 LLP and Counter-defendant Red Rock Financial Services, LLC ("Red Rock") by and through
21 its attorney of record Steven B. Scow, Esq. of the law firm of Koch & Scow LLC hereby
22 stipulate and agree as follows with regard to Red Rock's Motion to Dismiss HSBC's
23 Counterclaim ("Motion") (ECF No. 27) filed with this Court on August 22, 2017:

24 Counsel for HSBC needs additional time to adequately respond to the arguments raised
25 in Red Rock's Motion. Due to the fluid nature of case law and inconsistent results of dispositive
26 motions in both state and federal court regarding the same contested issues in this case, counsel
27 needs additional time to draft an adequate response. In exchange for this extension, HSBC
28 agrees that the customary time to file a Reply in Support of Red Rock's Motion shall be tolled
until such time as HSBC files its Opposition thereto.

The previous deadline to file an Opposition to Red Rock's Motion was September 5,
2017. The deadline to file an Opposition to Red Rock's Motion to Dismiss HSBC's

Counterclaim is hereby extended until September 12, 2017. This is the first request for such an extension, and it is made and in good faith and not for purposes of delay.

IT IS SO STIPULATED AND AGREED.

Dated this 5th day of September, 2017.

Dated this 5th day of September, 2017.

WRIGHT, FINLAY & ZAK, LLP

THE WRIGHT LAW GROUP, P.C.

/s/ Patrick J. Davis, Esq.

/s/ Steven B. Scow, Esq.

Edgar C. Smith, Esq.

Steven B. Scow, Esq.

Nevada Bar No. 5506

Nevada Bar No. 9906

Patrick J. Davis, Esq.

1500 S. Eastern Ave., Ste. 210

Nevada Bar No. 13330

Las Vegas, NV 89052

7785 W. Sahara Ave., Suite 200

sscow@kochscow.com

Las Vegas, NV 89117

Attorney for Red Rock Financial Services, LLC

(702) 475-7964; Fax: (702) 946-1345

pdavis@wrightlegal.net

Attorneys for Defendant, HSBC Bank USA

N.A., as Trustee on Behalf of ACE Securities

Corp. Home Equity Loan Trust and for the

Registered Holders of ACE Securities Corp.

Home Equity Loan Trust Series 2006-HE2,

Asset Backed Pass Through Certificates

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

Dated: September 6, 2017.